

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Karen Block aka Karen A. Block
Debtor

MIDFIRST BANK		:	BK NO. 19-04853 RNO
	Movant	:	
v.		:	CHAPTER 7
		:	
Karen Block aka Karen A. Block		:	
	Debtor	:	
and		:	
		:	
Robert P. Sheils, Jr., Esq.		:	
	Trustee	:	

ANSWER TO MOTION FOR RELIEF OF MIDFIRST BANK

NOW COMES Trustee, Robert P. Sheils, Jr., Esquire, by and through his attorneys, Sheils Law Associates, P.C., and answers the Motion of Midfirst Bank for Automatic Stay, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation, Trustee is without sufficient knowledge

or information to form a belief as to the truth of the averment in Movant's paragraph five and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors currently scheduled for January 31, 2020.

6. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded. By way of further answer, it is believed that the Trustee will have more information on this issue at the conclusion of the Debtor's 341 meeting of creditors.

7. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded.

8. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded.

9. Admitted.

10. Admitted.

11. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eleven and strict proof thereof is demanded.

12. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph twelve and strict proof thereof is demanded.

13. Denied. After reasonable investigation, Trustee is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph thirteen and strict proof thereof is demanded.

WHEREFORE, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's Motion for Relief until after the 341 meeting of creditors currently scheduled for January 31, 2020.

Dated: December 18, 2019

/s/ Jill M. Spott
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